

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***COMMENTS RECEIVED & RESPONSE***

ON THE CONDITIONAL MAJOR DRAFT PERMIT F-04-010

Fontaine Trailer Company  
Princeton, Kentucky 42445  
July 23, 2004  
Plant I.D. # 021-033-00035  
Application Log # 56033

Only one comment was received on Fontaine Trailer Company's Draft Conditional Major Air Quality Permit. This comment / requested change was submitted by Lori P. Andrews of Fontaine Trailer Company via telephone on May 20, 2004.

**Conditional Major Permit**

1. Page 2, EP1-4/Description – "Non-HAP, Non-VOC liquid cleanup solution (2 gal/day)" is no longer used. The permit application listed acetone as the cleanup solution being used. Fontaine Trailer has requested change of the permit language to allow usage of other solvent-based cleanup solutions. Usage rate should remain at 2 gallons per day for each spray booth. An MSDS was submitted for the proposed cleanup solvent. The new cleanup solvent is 100% VOC, but contains no HAP. Fontaine Trailer Company is not requesting a change in the permit emission limitations.

*Division's response: The Division has revised the permit as requested by the source. The Description for Emission Points 1-4 now reads, "Solvent based liquid cleanup solution (2 gal/day)". Emission limitations proposed in the Draft permit will remain unchanged. Other changes to the supporting documentation, as brought about by this request are as follows.*

**Permit Application Summary Form**

1. Emissions Summary – Estimated Actual Emissions for VOC increased from 56.8 TPY to 67.4 TPY in the emissions summary table.
2. Source Process Description – Original description reads, "Clean-up solution used for the painting operations is acetone (no VOC)." This statement has changed to, "Clean-up solution used for the coating equipment is 2 gal/day per booth, (8 gal/day total)".

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.